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December 10, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Rm-9108

Re: Docket No. RM9108
Ex Parte Presentation

Dear Ms. Roman Salas:

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to Long Distance International Inc. ("LDI"), a provider of 1010XXX service, I, along with representatives of LDI met yesterday with Jim Casserly, Senior Legal Advisor to Commissioner Susan Ness.

During this meeting, we discussed LDI's position with respect to the inability of interexchange carriers to identify incumbent local exchange carriers or competitive local exchange carriers for casual calls. A copy of the following enclosures were submitted to Mr. Casserly:


- An LDI memorandum entitled "Casual Calling Problem" and
- An LDI written presentation describing LDI's business operations, outlining the casual calling problem, and setting forth possible solutions.

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Ms. Magalie Roman Salas
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In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for the above-referenced proceeding.

Sincerely,


Randall B. Lowe

RBL/deb

Enclosures

cc(w/o encl.): Jim Casserly
Dorothy Attwood
Jonathan B. Mirsky
Len Sawicki

LONG DISTANCE INTERNATIONAL INC.

Notes:

LONG DISTANCE
INTERNATIONAL INC.

CASUAL CALLING

RANDY SUEVA LOVE
DIRECTOR REGULATORY AFFAIRS
LONG DISTANCE INTERNATIONAL INC.

CASUAL CALLING "NIGHTMARES"

FACT
OR
FICTION!

Notes:

LONG-DISTANCE INTERNATIONAL INC.

.. WHO ARE WE

- ..
- ..
- ..
- ..
- ..

LONG-DISTANCE INTERNATIONAL INC.

.. WHY DOES LDI CARE ABOUT CASUAL CALLING

- ..
- ..
- ..
- ..
- ..

MAJOR "CHALLENGES"

.. CHALLENGES CAUSED BY THE FOLLOWING

- ..
- ..
- ..
- ..
- ..

Notes:

CLECS

CLEC RESELLERS

DETAILS

- .. BROADBAND CARRIER
- .. BNA
- .. DISCOUNT CARRIER
- .. FIBER

HOW DOES EDC COMBAT THE PROBLEM TODAY?

- .. WHERE INFORMATION IS AVAILABLE THE BIDDERS ARE NOT BELONGING TO EACH OTHERS COLLECTION
- .. WHERE LOSS OF INFORMATION ACCUMULATED BY INFORMATION FROM MANY SOURCES THE BIDDERS ARE BELONGING TO CLEC RESELLERS
- .. NOT AN OPTIMAL APPROACH TO CUMULATING

Notes:

PROPOSED SOLUTIONS

.. SHORT TERM

- .. Build an "affordable" database similar to LIDB accessible to all carriers
- .. Billing and Collection Agreement with CLECS
- .. Billing and Collection Agreement with CLECS and CLEC Resellers
- .. CLEC Reseller (e.g. E-Source, INC) central caller bill

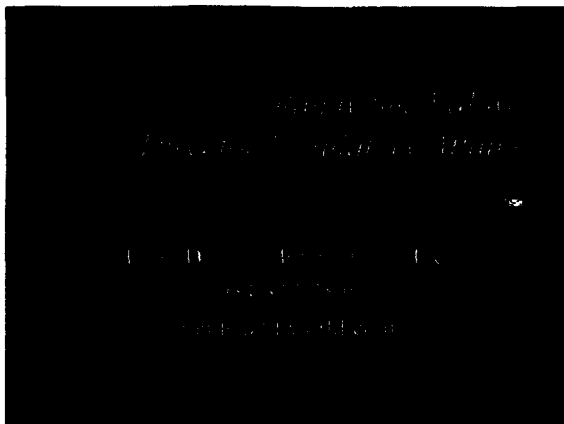
PROPOSED SOLUTIONS

.. LONG TERM

- .. Build an "affordable" database similar to LIDB accessible to all carriers
- .. Billing and Collection Agreement with CLECS and CLEC Resellers

THE "NIGHTMARE"

- .. PERPETUATION OF FRAUD
- .. BLOCKING OF ANIS
- .. LESS CONSUMER CHOICE
- .. POSSIBLE EXTINCTION OF CASUAL CALLING



Notes:

CASUAL CALLING PROBLEM

PROBLEM

- The inability of interexchange carriers ("IXCs") to identify the incumbent local exchange carrier ("ILEC") or competitive local exchange carrier ("CLEC") for casual calls (*i.e.*, 1010XXX, 0⁺, 0⁻) thereby not allowing IXCs to determine whether it has a billing arrangement with the ILEC or CLEC which has the potential of encouraging consumer fraud.

REASON

- With the introduction of competition to the local exchange and associated policies such as resale and local number portability, NPA-NXXs can no longer be identified with a particular ILEC or CLEC.

SOLUTIONS

- A ten-digit line number data base, such as LIDB, that identifies an ILEC and CLEC.
- Require cost effective, non-discriminatory billing solutions, *i.e.*, require each LEC to offer billing and collection services at a reasonable prices.
- Realizing that the implementation of a ten digit line number data base may be time consuming, as an interim measure, require ILECs and CLECs to provide IXCs with a means by which to identify telephone numbers which they serve and, if necessary, protect such information by treating it as consumer proprietary network information. (47 U.S.C. § 222 (b), (c) 1996; 47 C.F.R. § 64.2005).

CONCLUSION

- Absent an interim or long-term solution, customer choice through casual calling will become unavailable thus resulting in IXCs being forced to block such calls. In the process, the growth of ILECs, CLECs and IXCs will be inhibited.